

Rep #1: Resident

Mark Harrison

From: [REDACTED]
Sent: 17 April 2026 08:03
To: Neighbourhood Planning
Subject: Feedback on Neighbourhood Plan

[REDACTED]
An excellent document.

I was most interested in the 'Wheel and Spoke' plans to improve footpaths and cycle routes. Our family regularly cycles or walks into town from Stratton, I am very keen for routes to be improved. It seems to me that the routes up to the RAU, Deer Park and Cirencester College should be a top priority. I regularly cycle up to Parkrun, at the RAU. That event attracts 200-300 people every Saturday and many want to cycle there. The surfaces on Tetbury Hill are dreadful and yet are used daily by so many people.

At the moment, the cycle path from Stratton follows the river. That route, although pretty, has never been a good option on a bike because the river path is narrow and busy with dogwalkers. I regularly push my bike along Gloucester Street until it becomes 2-way. In the past I know that there has been discussion about making that short section of Gloucester Street a Contraflow for cyclists, which would be good. The other alternative is to stay on the main road and turn right opposite Bowling Green Lane - not a nice junction for a cyclist.

I often wish that I could cycle to Abbey Home Farm. It would be great if a route could be extended beyond Hare bushes.

Thanks for all your hard work on this.

[REDACTED]

Rep #2: Resident

REPRESENTATION TO THE CIRENCESTER NEIGHBOURHOOD PLAN

Submission Version (Regulation 16)

Date: 17 April 2026

Plan reference: Cirencester Neighbourhood Plan, Part 1, Reg 16, January 2026

1. Introduction and Summary of Concerns

I am a resident of Cirencester and submit this representation in response to the Regulation 16 consultation on the Cirencester Neighbourhood Plan (Submission Version, January 2026). I have read the plan carefully and wish to raise concerns about its soundness in the following respects.

This representation does not object to neighbourhood planning as a process, nor does it challenge the housing numbers set by the Cotswold District Local Plan, which falls outside the scope of this plan. My concerns relate specifically to the soundness of this plan as submitted: in particular, whether its policies are sufficiently effective and justified given the plan's own evidence base.

The NPPF (paragraphs 35 and 36) requires neighbourhood plans to be sound, meaning they must be: (a) positively prepared; (b) justified; (c) effective; and (d) consistent with national policy. This representation argues that the plan fails the effectiveness test in several material respects, because it acknowledges serious infrastructure deficits and environmental pressures but then adopts policies too weak to address them before or during further development.

Summary of soundness concerns raised in this representation:

1. Infrastructure sequencing: the plan identifies severe capacity deficits in sewerage, healthcare, and transport but does not make further development conditional on their resolution.
2. Flood risk and drainage: the plan acknowledges existing sewer overflow into the River Churn and high groundwater levels but the relevant policies use aspirational rather than mandatory language.
3. Green Gaps policy (NE5): the wording permits loss of undeveloped land between Cirencester and neighbouring settlements through compensation, which undermines the stated protective intent.
4. Cumulative impact: the plan presents evidence of disproportionate recent growth (the Steadings accounting for 95% of population increase since 2011) but contains no policy mechanism to assess or limit further cumulative impact.

2. Cumulative Impact: Disproportionate Recent Growth Without a Policy Response

2.1 The plan's own evidence

Paragraph 2.24 of the plan states that Cirencester is currently providing a quarter of the Cotswold District's allocation of new homes via the Steadings development. The plan's contextual section records that the population rose by approximately 1,000 between 2011 and 2021, with 95% of that increase attributable to the Steadings strategic allocation of more than 2,000 homes.

This is a remarkable concentration of new development. It means that over the last decade, Cirencester has absorbed a major strategic site that has fundamentally altered the scale and character of the town, placing pressure on roads, public transport, schools, GP surgeries, the sewer network, and the River Churn.

2.2 The policy gap

Notwithstanding this evidence, the plan contains no policy that:

- acknowledges the cumulative impact of the Steadings and treats it as relevant context for future decisions;
- sets a threshold or trigger at which further residential growth should be assessed against infrastructure capacity;
- requires a cumulative impact assessment before future planning permissions are granted.

The vision statement (page 4) speaks of “sympathetic, high quality and sustainable economic and residential growth” but provides no mechanism for determining when growth ceases to be sustainable. A plan that acknowledges disproportionate recent growth but provides no policy response to its consequences fails the effectiveness test.

REQUESTED MODIFICATION: Request for modification (no specific policy): New policy on cumulative impact assessment

Current wording:

No such policy currently exists.

Proposed wording:

Before the grant of planning permission for any residential development of 10 or more dwellings, the applicant shall demonstrate, to the satisfaction of the local planning authority, that the cumulative impact of recent residential development in Cirencester (including but not limited to the Steadings strategic allocation) has been assessed in relation to: (a) sewer and water treatment capacity; (b) GP and primary healthcare provision; (c) road network and public transport capacity; (d) school places. Development shall not be permitted where this assessment demonstrates that existing capacity is insufficient and no committed programme for its resolution is in place.

Justification:

The plan’s own evidence base identifies pressure across all four of these areas as a direct consequence of recent growth. A plan without a cumulative impact mechanism cannot be effective in managing further growth sustainably.

3. Infrastructure Sequencing: Aspirational Language is Not Effective Policy

3.1 Sewerage and water treatment

Paragraph 10.51 of the plan states in plain terms that “the inadequacy of the current sewer system means that during storms raw sewage is pumped into the river.” Paragraph 10.52 states that “even in good weather, the town is at capacity with water treatment” and that Shorcote sewage works already serves a population of 34,000.

This is not a projected future risk. It is a documented existing condition: the sewerage system is already overloaded, and any further development will add to that load.

The policy response to this evidence is found in paragraph 10.53, which states that new developments “should provide additional sewer capacity their building will require.”

Soundness concern: ineffective policy wording

The word 'should' is advisory. In planning policy, mandatory requirements use 'must', 'will be required to' or 'shall'. A policy that 'should' require sewer capacity can be set aside by a decision-maker who judges the requirement disproportionate or impractical. Given the plan's own evidence that the system is already at capacity and causing environmental harm (raw sewage in the River Churn), an advisory policy is not effective.

3.2 Healthcare provision

The plan acknowledges that GP surgeries are operating with waiting lists and that there has been no new health provision on any of the new housing developments built since the 1960s (paragraph 2.30). This is a significant admission: 2,000+ homes have been built at the Steadings with no corresponding healthcare infrastructure delivered.

The plan contains no policy that makes future residential development conditional on demonstrated healthcare capacity or committed infrastructure delivery. Section 12 (Wellbeing and Community) addresses community health aspirationally but there is no policy equivalent to a pre-commencement condition requiring healthcare provision to be secured before development proceeds.

3.3 The test of effectiveness

NPPF paragraph 35(c) requires plans to be effective: “the plan should be deliverable over its period and based on effective policies.” A policy that encourages infrastructure delivery without making development conditional on it does not meet this test. The Inspector examining this plan will be entitled to ask: if existing capacity is already exceeded, what in this plan prevents further harm from future development?

The answer, as the plan is currently drafted, is: nothing enforceable.

REQUESTED MODIFICATION: Request for modification: Infrastructure sequencing condition

Current wording:

Paragraph 10.53: 'New developments should provide additional sewer capacity their building will require...'

Proposed wording:

New residential developments must demonstrate, prior to the grant of planning permission, that adequate sewer and water treatment capacity exists or will be provided to serve the development without increasing the frequency or volume of sewage discharge into the River Churn or any other watercourse. Where existing capacity is insufficient, development shall not be permitted unless a legally binding agreement is in place with the relevant utility provider for the delivery of necessary infrastructure upgrades prior to first occupation.

Justification:

The plan's own evidence base (paragraphs 10.51 and 10.52) establishes that the existing system is already at or beyond capacity and is causing documented environmental harm. An advisory policy is not effective in these circumstances. The modification aligns with NPPF paragraph 35(c) and the Environment Act 2021.

4. Flood Risk and Drainage: Policy Does Not Match the Severity of the Evidence

4.1 Existing flood vulnerability

Paragraph 2.8 identifies that parts of Cirencester are particularly vulnerable to flooding, citing flood zones covering Stratton Meadow, Kingsmeadow, and areas alongside the inner ring road. The same paragraph notes that sewers serving Chesterton and the Abbey area are inadequate, with foul water entering the River Churn. Paragraph 10.8 records that 2021 flooding events heightened concerns about both sudden heavy rainfall and rising groundwater.

Paragraph 10.54 acknowledges that in much of Cirencester, ground water levels are too high for soakaways to be effective, and states that “development should not take place on flood meadows and should leave an 8m buffer strip to allow for additional capacity.”

4.2 Policy NE5: Green Gaps

Policy NE5 (Green Gaps) states: “Proposals that result in the loss of undeveloped land between Cirencester and its neighbouring parishes should compensate for this loss through appropriate replacement landscaped areas.”

Soundness concern: Policy NE5 permits what it appears to prevent

The stated purpose of a Green Gaps policy is to prevent coalescence between settlements and protect the character and identity of the town. Policy NE5 as drafted does not prevent the loss of undeveloped land: it permits it, provided compensation is offered. This is not a protective policy; it is a managed-erosion policy. It fails to protect the green gaps that the plan's own paragraphs 10.3 and 10.8 identify as providing flood absorption capacity, biodiversity corridors, and separation between settlements.

The 2021 flood events are directly referenced in the plan. Green buffer land between the town and neighbouring settlements serves a flood management function alongside its landscape and separation roles. A policy that permits its loss in exchange for “replacement landscaped areas” (which may be much smaller in area or less hydrologically functional) does not adequately protect this capacity.

REQUESTED MODIFICATION: Request for modification: Policy NE5 (Green Gaps)

Current wording:

Proposals that result in the loss of undeveloped land between Cirencester and its neighbouring parishes should compensate for this loss through appropriate replacement landscaped areas.

Proposed wording:

Development proposals that would result in the loss of, or material harm to, undeveloped land within the Green Gaps identified on the Policies Map will be refused. Exceptions will only be permitted in very special circumstances where it can be demonstrated that: (a) the proposal would deliver essential community infrastructure with no viable alternative location; (b) the hydrological, ecological and landscape functions of the affected land will be fully maintained; and (c) there is no net loss of land providing flood absorption or attenuation capacity.

Justification:

The current wording inverts the policy intention by permitting loss through compensation. The modification aligns NE5 with the approach taken in Policy NE4 (Local Green Space Designations), which correctly protects designated spaces 'except in very special circumstances.' There is no justification for a weaker test in Green Gaps, particularly given the plan's own evidence on flood risk and the groundwater conditions in Cirencester.

5. Landscape and Townscape Views: Advisory Wording Leaves Vulnerable Sites Exposed

5.1 Policy DBE2: Protection of Landscape and Townscape Views

Policy DBE2 requires development proposals to “demonstrate how they will protect and enhance” a list of identified important views. The policy then lists specific locations of concern. Two are particularly notable in the context of future residential development:

- The former Watermoor Primary School site (Trinity Road and Watermoor Road): the plan explicitly states the school “is currently empty and vulnerable to development” and that development “could and would” affect valued views of the church spire.
- Powell’s School Playing Fields (Barton Lane): described as an open aspect from extensive school playing fields which “can sometimes offer potential to reduce in size and zone for development.”

Soundness concern: the plan flags vulnerability but provides no hard protection

Both sites are identified in the plan's own evidence as being at risk of development. The policy response is to list them as views to be 'protected and enhanced.' This is not site-specific protection. A developer proposing residential development on either site could argue that the proposal 'demonstrates how it will protect and enhance' the view, perhaps by setting back buildings or retaining sightlines, and Policy DBE2 would provide very limited grounds for refusal. The plan identifies the problem but provides no effective solution.

REQUESTED MODIFICATION: Request for modification: Policy DBE2 and at-risk sites

Current wording:

Development proposals should demonstrate how they will protect and enhance the following views... [list follows]

Proposed wording:

The existing view protection requirement should be retained and strengthened by adding: 'For the specific sites identified at (a) former Watermoor Primary School and (g) Powell's School Playing Fields at Barton Lane, which are identified in this plan as being particularly vulnerable to development that would harm identified views and the open character of their settings, development proposals must demonstrate that no harm will occur to the identified views. Where a proposal would cause harm to these views, it will be refused unless it can be demonstrated there are material considerations of sufficient weight to justify an exception, and any harm is fully mitigated.'

Justification:

The plan identifies these specific sites as vulnerable. Without site-specific policy protection, the general view protection requirement is insufficiently effective to prevent harm. This modification makes explicit what the plan's evidence implies.

6. Royal Agricultural University Innovation Village: Unresolved Development Pressure

The plan (paragraph 2.24, as noted in the evidence base for this plan) refers to the possibility that if new student accommodation is approved for the Royal Agricultural University, further student accommodation should be considered through the RAU masterplan for the "Innovation Village." Employment land is also noted as being designated within the proposed Innovation Village on University land (paragraph 11.6).

This amounts to an implicit acceptance that a further phase of development is anticipated on the western edge of the town, beyond the Steadings. The plan does not contain any policy that:

- defines the boundary of acceptable development associated with the Innovation Village;
- makes such development conditional on resolution of the infrastructure deficits already identified in this plan;
- assesses the cumulative impact of Innovation Village development alongside the unresolved pressures from the Steadings.

A plan that anticipates further growth in a specific location but provides no policy framework to govern it is not effective. The examiner should be asked to consider whether a specific policy or development brief for the Innovation Village area is required as a condition of the plan's soundness, or alternatively whether the plan should expressly state that no further residential development associated with the RAU will be permitted until identified infrastructure deficits are resolved.

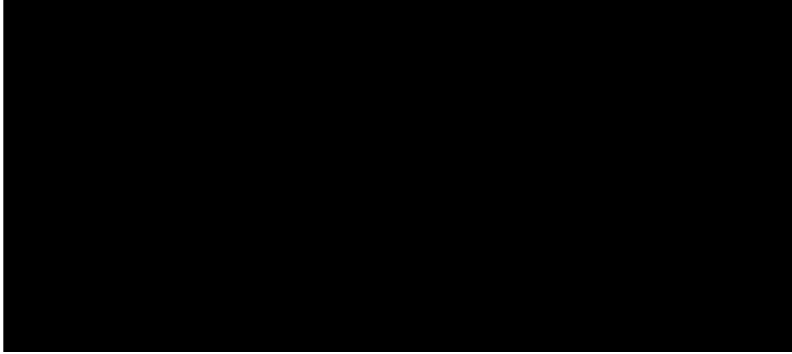
7. Conclusion and Requested Actions

I ask the Examiner to consider the following modifications as necessary to make the plan sound:

Policy / Issue	Soundness concern	Requested modification
Cumulative impact (no policy)	No policy assesses or limits cumulative development impact despite evidence of disproportionate recent growth	New policy requiring cumulative impact assessment before residential development of 10+ dwellings
Infrastructure sequencing (para 10.53)	'Should' language is aspirational, not effective, given documented sewer capacity failure	Mandatory pre-permission requirement for demonstrated sewer capacity or legally binding upgrade agreement
Healthcare provision (no policy)	No policy makes development conditional on GP/healthcare capacity despite admitted waiting lists	New policy requiring healthcare infrastructure to be secured before development commences
Policy NE5 (Green Gaps)	Permits loss of undeveloped land through compensation; undermines flood absorption capacity	Strengthen to resist loss except in very special circumstances; require no net loss of flood-attenuation land
Policy DBE2 (Landscape Views)	Identifies vulnerable sites but provides only advisory protection	Add site-specific protection for Watermoor School and Powell's Playing Fields
Innovation Village / RAU	Further development anticipated but no policy framework or infrastructure sequencing requirement	Define boundary, condition on infrastructure resolution, or explicitly defer pending Steadings assessment

I consider that the plan as submitted is not sound in the respects identified above.

However, I recognise that the role of the Examiner is not to reject the plan but to identify modifications necessary to make it sound. I therefore ask that the Examiner require the modifications described in this representation as conditions of the plan's approval.



Date: 17 April 2026

Rep #3: NATIONAL HIGHWAYS

Mark Harrison

From: Sally Parish [REDACTED]
Sent: 20 April 2026 15:39
To: Neighbourhood Planning
Cc: [REDACTED]
Subject: DL 29/5/26 - Cirencester Neighbourhood Plan - Reg. 16 Consultation - National Highways response

[REDACTED]
Mark,

Thank you for providing National Highways with the opportunity to comment on the draft Cirencester Neighbourhood Plan – Regulation 16 Consultation. National Highways is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance consists of the A417 which runs through the north east of the Plan area. We previously provided comments on the Regulation 14 draft in March 2024.

We are interested in the traffic impact of any future development proposal and specifically the impact of growth on the continued safe and efficient operation of the SRN. In respect of traffic and transport, Plan polices should ensure development mitigates its traffic impact on the surrounding network which includes reducing the reliance on the private car by requiring development to both safeguard and improve local facilities, services, and sustainable transport options.

Following our review of the draft we are satisfied that the proposed policies within the draft Neighbourhood Plan are unlikely to result in development which will adversely impact the SRN and we therefore have no specific comments to make on the document. This does not however prejudice any future responses National Highways may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time.

Kind regards,

Sally

Sally Parish, Spatial Planning, South West Operations

[REDACTED] B

Web: www.nationalhighways.co.uk

Covering: B&NES, Bristol, Cheltenham, Cotswolds, Forest of Dean, Gloucester City, South Gloucestershire, Stroud, Tewkesbury, West of England

[REDACTED]



Rep #4: Thames Water

David Wilson

Issued via email:
neighbourhood.planning@cotswold.gov.uk

13 May 2026

Cotswold District – Cirencester Neighbourhood Plan Consultation Submission Version

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment upon the above.

As you will be aware, Thames Water are the statutory water supply and sewerage undertaker for the majority of the Cotswold District and are hence a “**specific consultation body**” in accordance with the Town & Country Planning (Local Planning) Regulations 2012.

We have the following comments on the consultation in relation to our water supply and sewerage undertakings:

General Water and Wastewater Infrastructure Comments

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2024, states: “*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...*”

Paragraph 11 states: “*Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”

Paragraph 28 relates to non-strategic policies and states: “*Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...*”

Paragraph 26 of the revised NPPF goes on to state: “*Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production*

of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”

The December 2025 draft National Planning Policy Framework (NPPF) consultation, published by the UK Government, proposes updates to national planning policy. The draft highlights the importance of resilient water infrastructure, with Policy W4: Water Infrastructure supporting the delivery and upgrade of water supply and treatment facilities. The policy recognises the benefits of improving capacity, reliability, and water quality, stating that proposals for such infrastructure should be given ‘substantial weight’.

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that *“Adequate water and wastewater infrastructure is needed to support sustainable development”* (Paragraph: 001, Reference ID: 34-001-20140306).

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply infrastructure;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s pre planning service are available at: <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

In light of the above comments and Government guidance we agree that the Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend that the Neighbourhood Plan include the following policy/supporting text:

“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”

“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”

Water Efficiency/Sustainable Design

The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:

<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the ‘Calculation Method’ or the ‘Fittings Approach’ (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

Proposed policy text:

“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”

Comments in relation to Flood Risk and SUDS

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract

water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits. The neighbourhood Plan should include a specific policy on SuDS in line with the following hierarchy:

“Developers should ensure that surface water run-off is managed as close to source as possible in line with the following drainage hierarchy:

1 store rainwater for later use

2 rainwater infiltration to ground at or close to source

3 rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)

4 discharge rainwater direct to a watercourse

5 controlled rainwater discharge to a surface water sewer/drain

6 controlled rainwater discharge to a combined sewer

It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”

Site Allocations

There are no new allocations in the draft Neighbourhood Plan and the level of information does not enable Thames Water to make an assessment of the impact the proposed development will have on the waste water/sewerage network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the type and scale of development together with the anticipated phasing.

Early engagement between the developers and Thames Water would be beneficial to understand:

- What water supply requirements are required on and off site
- What drainage requirements are required on and off site
- Clarity on what loading/flow from the development is anticipated

Upgrades to the Thames Water infrastructure should not be underestimated. It can take 18 months to 3 years for local upgrades, 3-5 years for more strategic ones and up to 10 years for Sewage treatment works.

We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed.

We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the above number if you have any queries.

Yours faithfully,

David Wilson
Thames Water Property Town Planner

Rep #5: Resident

Mark Harrison

From: [REDACTED]
Sent: 15 May 2026 20:43
To: Neighbourhood Planning
Subject: Comments on Cirencester Neighbourhood Plan

[REDACTED]
Hello,

Please see below for my comments on the Neighbourhood Plan:

Policy AM4 –Mobility Hub

Having lived in the town for over 40 years the need for a transport hub is greater than ever. The Old Station site is by far the best location – close to dual carriageway, short walk to town centre, near to hospital and RAU.

Policy DB5a – Net-Zero & Energy Efficiency

I note the inclusion of the phrase “embodied carbon”. In order to reduce energy loss from buildings developers will need to increase the use of insulation materials which themselves will increase the embodied carbon footprint. This would seem to make it impossible to satisfy the policy.

Policy DBE6 – Energy Use in New Buildings

For owners of homes built to a net zero standard there would be a benefit of markedly reduced energy bills compared with those built under existing legislation. Owners would therefore benefit from having an increased level of disposable income some of which would be likely to support the town’s economy. Developers using land with extant planning permission should be persuaded to build to a higher (net zero) standard; this would merely equate to something in the order of 2% on their investment returns.

Policy TMN1 – 20 Minute Neighbourhoods

Greater emphasis should be placed on the provision of appropriate health facilities within the 20 minute neighbourhood.

Policy WBC1 – Air Quality

An additional requirement for the Council to monitor air quality (including particulates) should be included.

Kind regards



Rep #6: Resident

Mark Harrison

From: [REDACTED]
Sent: 21 May 2026 09:13
To: Neighbourhood Planning
Subject: Neighbourhood plan comment

[REDACTED]

Good morning.

I have a few comments and ideas.

Parking.

1. For current residents who live in historic housing without parking provision.

We are gradually being squeezed out and parking becoming more limited.

Eg The recent change on Dollar Street which has compromised locals without good a good enough reason forthcoming from the highways department.

A now v quiet road, after school drop off. We can walk into town in the middle of the road at most times of the day and especially in the evenings.

Where can residents park now? Especially in the evenings after work?

2. New builds and conversions within the town centre.

No new building or conversion should be permitted without adequate parking provision. People have cars and will always have cars. Unless the public transport is considerably improved provision for parking should be of high priority. It's not. It's being ignored. Applications are being allowed without this provision. This is against your very own recommendations. Why?

3. Parking charges and spaces.

Too expensive.

Why put such a barrier up to those wanting to visit Cirencester. Make it cheaper and they will come.

Market place evening.

Allow parking in the centre in the evening. It's so quiet and unnecessarily policed. We live on Dollar Street and there are almost no cars after 8/9pm.

Getting around town

1. As castle Street is now one way (the other way), some residents have to do a huge loop, going through the market place.

2. When some roads are closed, eg around Waitrose, there is no way of accessing our road unless you take a massive detour via Kemble or similar. Better signage would help but it is a problem generally.

3. The market place. It's it still a shared space? I have noticed the signs have gone but there has been no notification.

4. Cricklade Street. This needs a decision. Is it pedestrian or a road. It's so confusing and never policed. I saw a man get knocked down outside Boots, I was hit by a cars wing mirror and my daughter was hit by The Robin bus. She contacted them but has heard nothing.

The road needs to be much much better. People who insist driving down there are far too fast. Why isn't it policed?

Thank you. Hope some of this helps.



Sent from my iPhone

Rep #7: Resident

Mark Harrison

From: [REDACTED]
Sent: 21 May 2026 09:15
To: Neighbourhood Planning
Subject: comment on Cirencester Neighbourhood Plan

[REDACTED]

I read in the neighbourhood plan that access to sport and recreational spaces is important. I would like to bring up the access to the Cricket Club and Tennis Club after 4.45pm (last entrance time to the park) via Cirencester Park. It is so frustrating that access to the park is so limited in the evenings. Where children should be able to walk from town to the club parents are having to get in cars and drive. It seems absolutely madness. Perhaps Bathurst would consider opening up access in the evenings just to the sports clubs access - in the summer months at least?!

Best regards,

[REDACTED]

Rep #8: Resident

Please see below my comments on the 2026 plan, some of which pick up on previous comments on the 2024 pre-submission consultation by myself, Huw Jones, also submitted as part of the response of Cirencester Wildlife Group.

There are very many improvements from what was already a notable and welcome document. Some highlights and remaining areas of concern are highlighted below.

Chapter 5 Town Centre

Welcome addition to Principle 18 "...minimising hard-standing surfaces and enhancing soakaway"

Chapter 6 Access and Movement

Policy AM1

Welcome additions to Policy AM1 which in the final paragraph makes welcome reference to biodiversity connectivity.

Could this be usefully spelt out more by adding ... "eg with green margins such as hedgerows, lines of trees" (I have avoided saying green verges as that might imply something limited and mowed!)

Also in the related ..

Para 6.8.14

Welcome specific additions to routes included in para 6.8.1.4 to 6.8.1.7

Policy AM3 g. and h. are strengthened but could be stronger.

g. could say moving all "visitor" and "non-essential" parking including all-day and long-stay parking towards the periphery?

h refers to "unnecessary" through traffic. Suggest losing the word "unnecessary" and adding the word "all" if as seems obvious, the aim is to remove all through traffic.

(For justification, just think of how much more pleasant it is to be on Cricklade Street than Dyer Street or Castle Street. Great that Cirencester is moving in the right direction unlike poor Tetbury with the bumper-to-bumper traffic through the town all day every day. What does that do for high street business!?)

Is it counter-productive to spell out the aspiration in a prominent place eg para 6.1

to pedestrianise the town centre to make it attractive to people and a safe, healthy and pleasant place to spend time?

Does this belong in 6.1?

Table 1 page 44

Under Cotswold Water Park and South Cerney.

Could add an additional reference in support of connectivity between Cirencester and the Cotswold Water Park/South Cerney (and Somerford Keynes) all via Siddington in:

Siddington Neighbourhood plan Policy Reg 14 version available at:

https://www.siddingtonparishcouncil.org.uk/wp-content/uploads/2026/03/SPC_1105_0326-Neighbourhood-DP-v2.pdf

In policy S10: Sustainable Transport and Active Travel. Part 2, proposed paths are supported:

Part 2a from Tesco to Siddington Road to Tesco

Part 2b from Siddington to Cirencester adjacent to Siddington Road

Part 2c Proposed route from Siddington through Orchard Fields to the Steadings;
Part 2d from Siddington to South Cerney via the disused railway line

... and additionally

2e The change in use of Green Lane (a Quiet Lane leading off Clark's Lane) from a highway to a foot and cycle route. (ie from Siddington to Shorncote (Somerford Keynes). This route is also supported in the LCWIP Table 1 P37 (Primary Route 1 Siddington to Shorncote).

NOTE: There is already welcome support for the LCWIP in Cirencester NP para 6.3

Chapter 10 National Environment

Local Green Spaces. The initial list of about 46 suggested green spaces has been cut back to 10 which is very disappointing. It seems as if a policy decision has been taken to exclude many categories of green space. This is not explained.

Why are churchyards and cemeteries excluded? Are they deemed not to be at risk. Nevertheless they are likely to have significant community and wildlife value.

Likewise allotments which have considerable community, amenity, public health and wildlife value. Sports fields have also been excluded yet these have significant amenity, community and public health benefits.

Some of Cirencester's most notable public parks as well as semi-natural green spaces are excluded yet these have significant footfall/public amenity value, cultural value and/or value to wildlife which makes them deserving of protection. A list of six exclusions in this last category (Parks and semi-natural green spaces) that are of particular note are listed below, tested against LGS designation criteria and their main qualifying attributes are listed. From most notable to least notable.

Using the NPPF LGS criteria:

Are they a) Close, Special Not extensive

Abbey Grounds Yes, Yes, ?

Kingshill Meadow Yes, Yes, Yes

City Bank Glade and Railway Embankment Yes, Yes, Yes

Wooded corridor along the Churn from a) Barn Theatre to Old Beeches Road bridge Yes, ?, Yes

Wooded corridor along the Churn from b) New Mills to Watermoor Point Yes, ?, Yes

Abbey Grounds. Extremely popular. Very accessible. High amenity value (playground, bandstand, table-tennis). Used for popular mass-participation public events (Phoenix Festival, Big Lunch). Landscaped – excellent views including across the lake to the parish church. Historic - culturally significant with visible medieval (Norman Arches, Abbey, Ice store) and ancient history (Roman Wall). Significant wildlife (two/three rivers, lake, veteran trees, mature trees, ponds, adjacent relatively undisturbed wildlife area).

Kingshill Meadow. Popular, very accessible. Amenity value (dog walkers), Wildlife value (pond with Great-crested newts), old and newly planted hedgerow, species-rich meadow with characteristic (Cotswold) limestone grassland species, trees. Unsuitable for development (under pylons, includes a former quarry backfilled with municipal (?) waste). This appears to have been almost entirely overlooked. There is a significant oversight in the 2024 consultation document where it is mistakenly considered to be part of the adjacent Kingshill Sports field and described as "an open area of field" (Appendix 4, Site 31). It is not – there is hedgerow, a pond, semi-natural grassland, an area that is orchid rich. Arguably this is worthy of Local Wildlife Site or Local

Nature Reserve status yet is omitted from the 2026 document altogether. The site was the venue for a significant recent (Feb 2026) community project organised by CTC with 200m of hedgerow, provided by the Tree Council with planting carried out by CTC, a community group and the nearby secondary school. I wonder if it has been lost in the confusion between three or four similarly named sites: Kingshill School playing fields, Kingshill Sports development/playing fields, Kingshill Meadow and Kingshill Country Park.

See Map below which shows Kingshill Meadow separate from Kingshill Primary School and the Playing fields there are:

A) meadow including species-rich grassland, trees, old hedgerow, newly planted hedgerow, a large pond.

B) Orchid-rich area. Not in use as part of playing field perhaps due to outcropping limestone and very thin soil cover.

C) Rough grassland



City Bank Glade

Significant popular footpaths connecting Beeches Estate to Ciren Primary School and town centre. Part of Hare Festival Way. Wildlife value (Woodland with mature trees, pond, river). Proposed as addition to City Bank LNR (City Bank LNR Management plan, 2025)

City Bank Railway embankment

Significant popular footpath connecting Beeches Estate to Watermoor. Wildlife value (Woodland with mature trees). Proposed as addition to City Bank LNR (CB LNR Management plan, 2025)

Wooded corridor along the Churn from a) Barn Theatre to Old Beeches Road bridge. Significant popular footpath connecting Beeches Estate to Watermoor. Part of Hare Festival Way. Wildlife value (Woodland with mature trees, river).

Wooded corridor along the Churn from b) New Mills to Watermoor Point. Footpath access with occasional use by dog walkers. Wildlife value (Woodland with mature trees, river).

To note that City Bank Recreation Field is part of the designated Local Nature Reserve at City Bank so appears to already enjoy greater protection than offered by Local Green Space designation.

Thank you for retaining sections 10.70 (risk of urban sprawl and damaging communities given increasing threat from development), 10.71 (public recognition of and support for the connection with the surrounding landscape), 10.7.2 (preserving distinct identity of Siddington and Preston), 10.7.3 (importance of visual separation),10.7.4 (prioritising development in less sensitive areas)

Rep #9: Resident

Mark Harrison

From: [REDACTED]
Sent: 26 May 2026 12:39
To: Neighbourhood Planning
Subject: Cirencester - Regulation 16 Consultation

[REDACTED]

The Cirencester Neighbourhood Plan is an impressive document – Thorough, comprehensive, detailed, professional. It is a long read, but it feels that it covers all the issues facing the Town.

However, the key question is – What difference will it make? The most pressing issues have been known for years but all that we have ended up with, after huge amounts of hard and high-quality work by volunteers and considerable expenditure by the Town Council, is a “Wish List”.

On joining the Neighbourhood Plan Steering Group in early 2020, and understanding what was required, I quickly concluded that what Cirencester requires is a timebound Action Plan, not a Neighbourhood Plan. This opinion did not diminish during the time of my membership, the majority of which was spent as Chair, until stepping down in July 2023. When are the issues, particularly around Active Travel, going to be addressed? To provide some examples:

- Cricklade Street in Cirencester was first partially pedestrianised in the late 1980s but still cars abuse the restrictions and, as soon as they are lifted at 16:30 (with the shops open for a further hour), it becomes a dangerous free-for-all
- Suggestions, fairly simple to implement, have been made on numerous occasions to stop the rat runs. The most important being from the Tetbury Road to the Gloucester Road via Park Street and Thomas Street. The other is along Lewis and Querns Lane. As the Plan states the Ring Road, built in the mid-1970s, creates numerous downsides in terms of Active Travel and should be keeping traffic out of historic streets. However, until the rat runs are addressed, the Town will not be accessing the full benefits that it could provide
- The Cirencester Local Cycling and Walking Infrastructure Plan (LCWIP) was published in June 2022 by Gloucestershire County Council. Four years later, while considerable sums are being invested to deliver a cycle path from Bishops Cleeve to Gloucester and beyond, there is no delivery plan for the Cirencester LCWIP. To provide just one small example of what is wrong in Cirencester, the shared space path along the Gloucester Road is dangerous for pedestrians and frustrating for cyclists. It beggars belief that it is considered an appropriate facility.

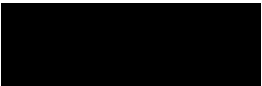
I do not want to nitpick through the document but do want to highlight a few points that jumped out of the page:

- The education provision is lauded but does not mention that a significant number of parents choose to send their children to the grammar schools in Cheltenham, Gloucester and Stroud. In addition, a smaller number also travel to Balcarras in Cheltenham and Farmors in Fairford for secondary education
- The cultural provision is less than it could be with the need to travel out of the Town for quality music concerts and events

- Mention is made of the Very Light Rail project which will never happen. This inclusion feels like virtue signalling
- The Town Centre Master Plan is mentioned but my understanding is that this project has been abandoned by the District Council
- The Plan covers a number of green spaces but does not mention the lack of space for informal ball games in the Bowling Green area. The Abbey Grounds could meet this need but there are two downsides:
 - The need for youngsters to cross the Whiteway or Spitalgate Lane, both of which lack traffic light-controlled crossings
 - Dogs allowed off the lead means that games would be continually interrupted
- The Plan mentions that the Leisure Centre is at full capacity but ignores the fact that much physical activity is delivered via community sports clubs which may well have similar issues as the Town expands.

To summarise, the Plan is an impressive document. However, it fails the key test of providing confidence that the items listed in the Projects List will ever be delivered.

Kind regards



Rep #10: Cirencester Action on Buses

Mark Harrison

From: [REDACTED]
Sent: 27 May 2026 08:00
To: Neighbourhood Planning
Subject: Cirencester Action on Buses' response to Cirencester Neighbourhood Plan - May 2026

Cirencester Action on Buses (CAoB)

Response to Cirencester Neighbourhood Plan – Regulation 16 Consultation

1. Introduction

Who we are:

Cirencester Action on Buses (CAoB) is an independent, volunteer-led passenger group representing the experiences of bus users in Cirencester and the surrounding area. We engage directly with operators, local authorities and other stakeholders and aim to support the development of a coherent, usable public transport network.

We welcome the opportunity to respond to the Cirencester Neighbourhood Plan, particularly in relation to access, movement and connectivity. CAoB also recognises the significant work undertaken by the Town Council and contributors in developing a comprehensive and detailed Plan.

2. Overall Position

CAoB supports the Plan's overarching aims, including:

- responding to the climate emergency;
- reducing reliance on private vehicles;
- improving access to employment, education and services;
- strengthening connections to surrounding towns, countryside and key destinations;
- improving wellbeing, inclusion and accessibility;
- and supporting connected, sustainable communities.

The Plan provides a clear and evidence-based diagnosis of current transport challenges, including:

- over-reliance on cars;
- limited and infrequent bus services;

- poor connectivity to Kemble Station;
- barriers to movement within the town;
- the effects of poor accessibility on inclusion and wellbeing.
- and the need to build sustainable transport into new development

CAoB particularly welcomes the Plan’s repeated emphasis on:

- connected neighbourhoods;
- permeability and movement between communities;
- access to community facilities and green spaces;
- reducing severance caused by major roads;
- and ensuring places are accessible without requiring a car.

A. Cirencester as a major employment, education, cultural and service centre.

The Plan also highlights the town's wider strategic importance. Major employers and institutions within the town include professional services, education providers and public sector organisations, alongside a significant hospitality and retail sector and a large number of smaller businesses and start-ups. Cirencester supports a substantial proportion of employment within the district and as such **attracts significant commuter movements from surrounding areas including Stroud, Swindon and North Wiltshire.**

The Plan also notes **recruitment challenges** in sectors including hospitality, digital and engineering, as well as difficulties recruiting key workers.

Together, these factors reinforce the **importance of ensuring that transport connectivity functions effectively both within the town and between Cirencester and surrounding communities.**

There is an opportunity to bring the same level of clarity applied to walking, cycling and road infrastructure to public transport provision. In particular, the Plan does not yet translate its analysis into sufficiently specific, deliverable public transport outcomes.

CAoB also welcomes the Plan’s explicit recognition that reducing reliance on private vehicles and supporting a “20 Minute Neighbourhood” model will require enhanced public transport, an Integrated Mobility Hub, and improved pedestrian and cycle access across the town.

CAoB strongly supports this integrated approach. However, the effectiveness of **these ambitions will depend not only on physical infrastructure, but also on the availability of practical, reliable and well-connected public transport services operating across the town and the wider area.**

B. Importance of public transport alongside 20 Minute Neighbourhoods:

The Plan also recognises that 20 Minute Neighbourhood principles depend upon accessibility “on foot, by cycle or public transport”, and **that many important destinations**, including healthcare,

employment, education and cultural facilities, **extend beyond immediate residential neighbourhoods**. This further reinforces the **importance of practical and well-connected public transport links both within Cirencester and to surrounding areas**.

C. Public Transport and New Development:

CAoB also considers it important that **new development is planned alongside well-integrated and accessible public transport provision from the outset**, including effective connections to employment, education, healthcare, rail services and surrounding communities.

Early implementation and visibility of sustainable transport options before development is completed and ideally before substantial occupation, may play an important role in shaping long-term travel patterns and encouraging greater use of public transport, walking and cycling from the outset, **rather than allowing car dependency to become established**.

3. Kemble Station Connectivity:

The Plan correctly identifies Kemble Station as a key transport asset, but notes that it is:

“not fully utilised because of poor bus service connections”
and that:

“improved connections are needed, including early morning, late evening and weekend services.”

CAoB strongly supports this analysis.

The Plan would benefit from clearer support for:

- regular, reliable, timetabled and easy-to-understand bus services operating to clear and memorable patterns between Cirencester and Kemble;
- operation across the full day, including earlier and later journeys that improve access to rail services;
- seven-day provision, including Sundays;
- and timetables aligned with train arrivals and departures.

The references elsewhere in the Plan and appendices to:

- regional connectivity;
- rail interchange;
- and enhanced all-week public transport links

reinforce the importance of practical integration between bus and rail services.

The importance of effective connectivity to Kemble Station is also likely to increase over time as Cirencester’s population grows and additional development comes forward over the Plan period.

Without this level of clarity, there is a risk that the issue is recognised but not effectively addressed.

4. Public Transport appearing in the Plan as a Service, Not Just as its Infrastructure

The Plan contains a number of important observations, proposals and policies relating to bus connectivity, interchange, information, accessibility and movement around the town.

It also demonstrates a strong understanding of the relationship between transport usability, journey times, interchange quality, passenger confidence and wider accessibility.

Compared with the extensive spatial and implementation detail relating to walking, cycling and public realm improvements, however, public transport service provision and wider network functionality are articulated in less operational and implementation detail.

CAoB would welcome the Plan providing similar clarity regarding the design and usability of public transport services themselves.

This includes:

- routes that connect effectively with the places people need to reach;
- regularity and reliability of services;
- frequency and journey times;
- direct and time-competitive connections to key destinations;
- simple, regular, memorable and easy-to-understand service patterns and timetables;
- good onward connections between services and modes of transport;
- ease of interchange;
- usability for everyday journeys;
- and practical accessibility for residents and visitors.

This is particularly important given the Plan's references to:

- commuting and employment access;
- pupil and student travel patterns;
- recruitment challenges across key sectors;
- tourism and the visitor economy;
- and social participation and wellbeing.
- access to clear information re services

- effective promotion of services,
- and understandable journey planning in both electronic and hard copy form

CAoB would emphasise that the **usability of public transport is strongly influenced by overall service design and network integration.**

All the above factors affect whether services can be used practically and confidently in everyday life.

Public transport is most effective when services are visible, easy to understand, well promoted, connect well with key destinations and provide reliable onward journeys throughout the day.

A transport system is only effective if it is practical and reliable for real-world use.

5. Cirencester College and Education Travel

The Plan notes significant daily education-related travel into and out of Cirencester, including approximately 2,395 students commuting daily into the town from outside Cirencester in 2022.

This reflects the town's wider role as an education centre and highlights the importance of effective and coordinated transport connectivity for students and pupils travelling from across the surrounding area.

This represents a major and consistent source of transport demand which is why the College in particular, has effectively become a significant commissioner of transport in the area.

The Plan could be strengthened by encouraging greater involvement of the College in discussions around town-wide transport design and service planning.

As a significant commissioner of transport services, the College has an important influence on wider travel patterns within and beyond Cirencester.

Changes to education-related transport provision may therefore have implications not only for students, but also for the wider usability, connectivity and functioning of the local transport network.

- There may also be value in encouraging schools and education providers to participate more closely in wider transport discussions, recognising the importance of pupil travel patterns within the local network and the potential impact of wider network changes on access to education.
- School and college travel forms a significant component of daily movement into and around Cirencester, and changes affecting major corridors may have wider implications for journey times, reliability, accessibility and wellbeing for young passengers and their families
- Local schools also represent a major and consistent group of public transport users whose travel needs form an important part of the wider transport picture.

This reinforces the **importance of coordination between major institutions, operators and transport authorities when significant transport changes are being considered.**

6. Integrated Mobility Hub

CAoB agrees with the Plan's assessment that Cirencester currently lacks a clear, well-functioning and integrated transport hub, and supports the principle of improved interchange facilities.

Any future mobility hub should **support integration between different forms of transport, including local bus services, longer-distance coach services, walking and cycling infrastructure, rail connectivity, and other sustainable transport modes identified within the Plan.**

At present, longer-distance coach services and the main local bus interchange points are located in different parts of the town centre, with limited integration between them. CAoB would also note that interchange arrangements and wayfinding are not always obvious for passengers, particularly visitors and infrequent users.

Clearer signposting, information and physical integration between transport modes could therefore play an important role in improving usability and confidence in the network. Improving the visibility and legibility of public transport across the town may also help encourage greater confidence and awareness among both existing and potential users.

The **quality, accessibility and visibility of bus stop infrastructure — including shelters, timetable information and real-time passenger information — may also influence confidence and usability** across the wider network.

The Plan also rightly recognises the importance of ensuring that bus services can access any future hub efficiently without unnecessary diversion through the one-way system, alongside the need for good customer facilities, real-time information, accessibility and accommodation for coaches, community transport and demand responsive services.

CAoB also welcomes the Plan's recognition of the importance of visitor information, customer facilities and appropriate operational facilities for transport staff within any future hub arrangement.

Well-designed interchange environments, including accessible information, seating, toilets, refreshments and appropriate driver welfare facilities, **may help improve usability**, passenger confidence, comfort and operational resilience across the wider network.

As **different** potential hub **sites may have very different implications** for movement, accessibility and interchange, **early visibility of emerging concepts and layouts may help support more informed discussion around usability, connectivity and integration with the wider transport network.**

However, it is important to ensure that:

"a hub supports a strong network, rather than acting as a substitute for it."

The effectiveness of any mobility hub will depend on:

- the frequency and reliability of services using it;

- the ease of connections between routes;
- integration with walking and cycling routes and other transport nodes;
- clear and consistent passenger information;
- and the ability of passengers to make practical onward journeys safely and confidently.

Walking and cycling routes are also likely to be **most effective where they connect clearly and conveniently not only with a central mobility hub, but also with bus stops and transport corridors across the wider network**. Integrating active travel routes with everyday public transport access points may help support more practical and flexible sustainable journeys across the town.

7. Bus Routing and Street Constraints

A. Street layout and routing:

The Plan highlights concerns that street layout and narrow roads can restrict bus operation.

CAoB recognises that physical constraints can affect routing. However:

- services do operate within the town;
- routing decisions are influenced by accessibility, operational considerations and passenger demand, although changes may sometimes disadvantage areas which also have significant levels of passenger use;
- and changes to routes can have unintended consequences for usability and patronage.

Recent changes to local routing patterns have also affected connectivity within parts of Cirencester itself, illustrating how service alterations can influence accessibility to employment, shopping, healthcare and community facilities even within the town.

Given the potential impact of route changes on accessibility, journey times, education access and connectivity within different parts of the town, significant re-routing proposals may benefit from early discussion and engagement with affected communities and stakeholders.

A balanced approach is therefore important, supporting:

- direct, legible and efficient routes;
- practical measures such as parking restrictions or provision of parking elsewhere, to improve bus movement where needed;
- and good accessibility between neighbourhoods, facilities and transport links.

B. Areas unserved by bus routes:

The Plan also identifies employment and retail areas where connectivity between different parts of the town remains limited.

There are specific areas of concern eg no return service to Watermoor from the town and no services at all for the industrial estate.

Improving practical links between residential areas, employment sites, retail areas and surrounding communities will help support accessibility, labour mobility and more sustainable travel patterns.

The wider themes within the Plan around permeability, movement and reducing severance are highly relevant here.

8. New Development – Including the Steadings

The Plan includes significant proposals for new development but **contains limited explicit reference to how public transport services will be integrated and implemented from the outset.**

The scale of planned growth further reinforces the importance of embedding and implementing public transport provision within development planning from the outset. The Plan notes that Cirencester is expected to accommodate a substantial proportion of the district's future housing growth over the Plan period.

This increases the importance of ensuring that transport infrastructure and services develop alongside housing growth in a coordinated and timely way.

CAoB recommends that the Plan should emphasise:

- early design and implementation of public transport provision;
- direct and convenient connections between easily walkable and accessible bus stops, transport corridors, wider public transport nodes and active travel routes;
- good, practical and well-connected public transport links between new development, the town centre, Kemble Station, employment areas, the Education Quarter, healthcare facilities and surrounding neighbourhoods;
- and integration between new neighbourhoods and existing communities.

Consideration should be given to how new development connects with a wider range of destinations across Cirencester and beyond it. Public transport provision is likely to be most effective where it forms part of an integrated town-wide network linking residential areas with employment, education, healthcare and strategic transport connections, rather than operating in isolation from existing movement patterns and services.

CAoB would also emphasise that early implementation is vital. If services are introduced only after development is complete, there is a risk that car-based travel patterns become established. Early provision can help shape more sustainable behaviour from the outset.

This is likely to be most effective where services are also clearly promoted, easy to understand and visibly integrated into everyday movement around the development and wider town.

This is particularly important given the Plan's wider ambitions around:

- sustainable growth;
- connected communities;
- 20-minute neighbourhood principles;
- and reducing dependence on the private car.

9. Access to The Cotswold Lakes, Surrounding Areas, Visitor Attractions, the RAU and reaching Stroud bus services on the Stroud Road

The Plan highlights the importance of tourism, access to countryside and links to surrounding areas. It also repeatedly emphasises wellbeing, recreation and access to green spaces, plus access to educational institutions.

A. Access to the Cotswold Lakes by public transport:

However, **access to key destinations such as The Cotswold Lakes remains challenging by public transport despite the area attracting significant visitor numbers.**

While usage levels are an important consideration, CAoB's experience suggests that demand for such services can be influenced by:

- **the ease and safety of onward walking routes;**
- **the visibility and quality of bus stop infrastructure;**
- the availability and clarity of information;
- service frequency and journey times;
- and the availability of practical return journeys.

Although services have operated along roads serving areas of **The Cotswold Lakes, public transport accessibility is significantly affected** not only by service provision itself, but also by the quality, visibility and **safety of supporting road, pavement and bus stop infrastructure.**

In a number of locations, bus stops may be separated from destinations by busy roads, limited crossing facilities or inadequate pedestrian infrastructure.

Bus stops may also be difficult to identify and may lack shelters, timetable information or real-time passenger information.

Also, information on how to access specific destinations by bus is limited, and existing services do not provide a comprehensive or easily understandable picture of access across the wider area.

The Plan itself identifies barriers affecting movement between Cirencester, South Cerney and the wider Cotswold Lakes area, including severance caused by major roads and constrained pedestrian and cycling access.

In practice, all these issues may significantly reduce the usability and attractiveness of public transport for both residents and visitors, particularly where journeys involve unsafe, indirect or unclear walking routes between stops and destinations.

CAoB is aware that a bus service operating towards parts of The Cotswold Lakes and nearby villages has recently been withdrawn.

B. Poor bus stop and pedestrian safety infrastructure affecting access to additional areas:

Poor integration between bus infrastructure and safe pedestrian access may also suppress demand for services in other places, which might otherwise support more sustainable access to recreational and visitor destinations across the area.

For instance, bus services to Stroud from Deer Park and the College if not accessed from inside the College and school campuses, are accessed by crossing a busy road from the College. Or, via limited pavements from the University.

Plus, access to the Royal Agricultural University main entrance by foot and public transport involves crossing busy roads and using routes with limited or absent pedestrian infrastructure, creating potential barriers to safe, convenient and attractive sustainable travel.

Also, public transport links to some locations exist but may not be well promoted or easily understood by visitors, potentially limiting awareness and use eg the amphitheatre.

The effectiveness of public transport is influenced not only by service provision itself, but also by the **visibility and promotion of available services and destinations. Clear, accessible and joined-up information can play an important role in helping both residents and visitors understand how public transport can be used** to access local facilities, employment, leisure opportunities, visitor attractions and surrounding communities.

This may also be important in encouraging greater awareness and confidence among existing residents who do not currently use public transport regularly, particularly where travel habits are strongly car-dependent.

Taken together, **limited information, constrained pedestrian access, inconsistent infrastructure and reduced service provision risk weakening public transport accessibility to some of the area's most significant visitor destinations.**

Given the scale of the visitor economy associated with Cirencester, the wider Cotswolds and The Cotswold Lakes, **there is an opportunity to consider how public transport connectivity could support wider tourism, accessibility and sustainability objectives across the area.**

Cirencester's role as a visitor destination, together with increasing visitor numbers and **parking pressures at peak times, further reinforces the importance of accessible and sustainable transport connections for visitors as well as residents.**

10. Very Light Rail

The Plan refers to the potential for a "Very Light Rail" link.

While this may represent a long-term aspiration, bus services offer:

- greater flexibility;
- wider geographic coverage;
- quicker and lower-cost implementation.
- They also provide an opportunity to test and build demand.

The Plan would benefit from prioritising deliverable bus-based improvements in the short to medium term.

11. Network Coordination, Oversight and Stability

CAoB's experience is that the effectiveness of the local bus network depends on coordination between:

- commercial services;
- supported services;
- and services commissioned by third parties, including education providers.

Changes to education-related transport provision demonstrate how alterations in one part of the network can have wider impacts, including:

- disruption to established journey patterns;
- reduced usability of services;
- and impacts on both general passengers and students.

This **highlights the importance of a network-wide approach.**

This is also important where services cross local authority boundaries. Recent changes to services linking Cirencester with Malmesbury and surrounding villages demonstrate how decisions taken outside the town can still have significant impacts on connectivity, accessibility and journey opportunities for residents.

In general, while demand responsive transport may play an important role in some contexts, it may not always provide the same level of certainty, simplicity or flexibility as a regular timetabled service, particularly for passengers making regular or time-sensitive journeys.

The Plan could therefore benefit from recognising the importance of coordination with all the stakeholders in Gloucestershire and with adjoining authorities.

Where significant service changes or route alterations are proposed, there may be value in earlier discussion and engagement with passengers, affected communities and relevant stakeholders in

order to help identify wider impacts on accessibility, journey times, interchange opportunities and wider network usability before changes are implemented.

As the Local Transport Authority, Gloucestershire County Council plays an important role in overseeing the wider transport network, understanding how different parts of the system interact, and supporting a coherent, connected and effective transport system across the wider area.

This includes not only infrastructure planning and providing supported bus services, but also understanding how all parts of the network interact, how any service changes affect wider connectivity, and how passengers experience the network in practice.

The Plan could usefully acknowledge the importance of:

- coordination across different types of services and operators;
- understanding the cumulative impacts of network changes on passengers and connectivity at an early stage;
- maintaining oversight of how services interact across the wider network;
- clear communication between stakeholders, including passengers;
- and ensuring that significant network changes are well understood and communicated at an early stage prior to and after implementation.

This also includes:

- timely communication of road closures and diversions;
- clear and accessible information for passengers;

The Plan itself also recognises the importance of ensuring that Cirencester's transport needs are reflected within wider county-level transport strategies.

As a significant employment, education, service and visitor centre serving a wide rural catchment — and as a location expected to accommodate substantial future growth — Cirencester's transport connectivity requirements extend well beyond those of a purely local neighbourhood centre.

CAoB considers that this wider strategic role should be clearly recognised within transport planning, coordination and service provision.

The Plan could also be strengthened by recognising the importance of:

- effective coordination between stakeholders;
- understanding how services interact;
- and supporting a coherent, joined-up network.

- Effective oversight, coordination and communication are important in maintaining confidence in the network, supporting integrated and sustainable travel patterns, and helping ensure that the wider transport network functions coherently for residents, workers and visitors.

Given the interconnected nature of public transport provision, there may be value in ensuring that network changes and emerging connectivity issues are identified, understood and managed proactively wherever possible.

12. Transport, Wellbeing and Community Participation

The later sections and appendices of the Plan rightly recognise the close relationship between:

- accessibility;
- wellbeing;
- inclusion;
- social participation;
- and community life.

CAoB particularly welcomes the recognition that poor or intermittent public transport can contribute to:

- frustration;
- anxiety;
- loneliness;
- and social isolation;

The Plan also identifies the importance of:

- cultural facilities;
- sports and recreation;
- community meeting spaces;
- hospitality and the evening economy;
- and access to green spaces and countryside.

Cirencester also functions as a significant service, cultural and community centre for the wider area, including healthcare provision, education, cultural venues, community facilities, retail and hospitality. **Access to these services and activities** is therefore **closely linked to the availability of**

practical and accessible transport connections both within the town and from surrounding communities.

For many residents, **participation in** these aspects of community life **depends upon the availability of practical and reliable public transport, particularly during evenings and weekends.**

CAoB also recognises the **importance of evening connectivity to larger surrounding centres such as Cheltenham and Swindon, alongside wider regional connectivity towards destinations including Gloucester, Bristol and Oxford.**

This further reinforces the role of public transport in supporting employment, education, leisure and wider regional accessibility beyond standard daytime travel patterns.

Reliable and accessible public transport also plays an important role in reducing social and economic isolation, particularly for residents without access to a private car and for those living in surrounding villages and rural areas.

The Plan also notes that Cirencester has **a relatively high proportion of residents aged 65 and over.** This **further reinforces the importance of accessible, understandable and reliable public transport for maintaining independence, access to services and participation in community life.**

Access to employment, education, healthcare, shopping and community life can all be affected by the availability, affordability and usability of local transport links. In some parts of Cirencester and surrounding villages, **services may be limited, indirect or unavailable altogether, or may not operate at times that support practical everyday journeys.**

In some cases, **available services and journey opportunities may also be poorly understood or insufficiently visible,** potentially limiting confidence and awareness among both existing and potential users.

The Plan's emphasis on connected and inclusive communities therefore provides an opportunity to consider how uneven accessibility and gaps in provision may affect participation, wellbeing and transport choice across the wider area.

CAoB also **welcomes complementary community and cultural transport initiatives** which may help widen participation and accessibility. **However, such schemes are most effective when operating alongside a stable and coherent core public transport network rather than substituting for it.**

Public transport should therefore be viewed not simply as transport infrastructure, but also as: community infrastructure; wellbeing infrastructure; and part of the wider accessibility framework supporting inclusive and sustainable communities.

The Plan's wider discussion of 20 Minute Neighbourhoods and community wellbeing also reinforces the importance of ensuring that residents can access not only nearby daily facilities, but also wider employment, healthcare, education, cultural and social opportunities across the town and beyond it. In this context, **public transport plays an important role in connecting neighbourhoods, reducing inequalities and supporting participation in community life.**

13. Conclusion

CAoB welcomes the Cirencester Neighbourhood Plan and its clear recognition of existing transport challenges.

The Plan contains strong and increasingly sophisticated recognition of the importance of sustainable transport, public transport connectivity, interchange, accessibility and movement around the town.

To fully deliver its objectives, however, the Plan would benefit from greater clarity on how these ambitions will translate into practical, usable and well-integrated transport provision and wider network functionality.

CAoB would welcome a stronger emphasis on:

- regular, reliable and well-connected bus services operating throughout the day and evening, across the week;
- effective integration with rail at Kemble;
- improved connectivity to key destinations including Cheltenham, Swindon, Gloucester and wider regional destinations accessed via Kemble and regional coach links, alongside strong connections to employment areas, the Education Quarter and surrounding communities;
- simple, legible, memorable and easy-to-understand service patterns and timetables;
- public transport provision embedded and implemented in new development from the outset;
- a network-first approach supported by infrastructure;
- clear information, visibility and promotion of services;
- high-quality and accessible stop and interchange infrastructure;
- and effective coordination and oversight to ensure that the network functions as a coherent whole.

The Plan increasingly recognises that accessibility, wellbeing, inclusion and participation are closely linked to practical transport provision.

Further strengthening the public transport dimension of the Plan would help ensure that its ambitions translate into real, usable and well-integrated transport options for residents, workers and visitors.

Rep #12: Landowner (Bathurst Estate)

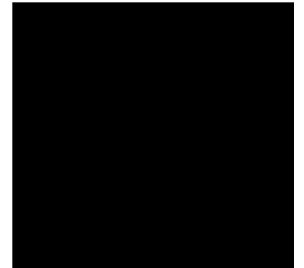
28 May 2026

L 260528 RL Bathurst CNHP Reg 16 Reps



Cotswold District Council
Trinity Road
Cirencester
GN7 1PX

Robert Linnell



Submitted via email to:
neighbourhood.planning@cotswold.gov.uk

Dear Sir/ Madam

Cirencester Neighbourhood Plan – Regulation 16 Consultation Representations on behalf of The Bathurst Estate and Bathurst Development Limited

Savills is instructed by The Bathurst Estate and Bathurst Development Limited (BE and BDL) to submit the following representations on the Cirencester Neighbourhood Plan Regulation 16 Consultation (CNHP).

BE owns and manages a significant number of properties and land within the Neighbourhood Plan area. BDL is the master developer responsible for delivering the strategic, mixed use development known as The Steadings to the south-west of the Town, which is partially within the Neighbourhood Plan area.

Overall, BE and BDL congratulate the Town Council and wider Neighbourhood Forum for all of its hard work in preparing the CNHP. The document is well evidenced, is clearly laid out and is generally supported. However, we have the following comments to make to improve the plan:

Plan Period

We note that our previous suggestion that the plan period should be extended to 15 years to 2041 has been included in the updated document. This is welcomed.

Alignment with the Cotswold Local Plan

BE and BDL supports neighbourhood planning but would question the timing of the CNHP in relation to the emerging Cotswold District Council Local Plan. The concern is that the National Planning Policy Framework (NPPF) states that the CNHP must support the strategic development needs set out in the strategic policies for the area and plan positively to support local development. This would include the policies relating to The Steadings development and any other allocations in the emerging Local Plan.

Should there be any conflict between two development policies the guidance states that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.

The emerging Local Plan will be consulted on in the coming months and will include strategic policies which are likely to relate to areas such as Cirencester and policies which relate to those contained with the current

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draft of the CNHP. There should, as a minimum, be consistency in the approach for particular policies and ideally limited cross over to avoid confusion.

For the above reasons, the CNHP should be progressed in line with the emerging Local Plan, rather than in advance of it, so that both documents are aligned.

The following comments relate to specific proposed policies and whether they meet the basic conditions required at examination.

Policy DBE 1 – Design Quality

In general this policy is supported and it aligns with the NPPF, the existing adopted Local Plan and there are likely to be similar policies in relation to design quality in the emerging Local Plan.

Whilst this is the case, criteria h) refers to building heights and limits this to 12 metres. This is not evidenced and it is questioned why this criteria is needed, especially given criteria f) requires proposals to respect the local distinctiveness. If there is concern regarding height in the town then policies should require a suitable assessment of the impact rather than imposing arbitrary height limits. At The Steadings a site specific assessment was carried out that justified buildings up to 14.5m in certain locations. These heights are approved under the extant planning permission. The policy should allow for such building heights.

The NPPF requires land to be used efficiently and one way to do this is going taller. This can result in highly sustainable and efficient buildings. It does not have to mean lower design quality. This policy should be more open to buildings that are designed for their surroundings and where taller buildings can be justified the plan should be open to this.

On this basis Criteria h) of the policy is not considered to align with policy and guidance and so fails the basic conditions tests for inclusion in the Neighbourhood plan. A simple change would be to remove the height limit and rely on the other criteria under the policy.

Policy DBE 5 – Net Zero & Energy Efficiency... & Policy DBE 6 – Energy Use in Buildings

These policies should be aligned with the Written Ministerial Statement issued on 13 December 2024 in relation to Local Energy Efficiency Standards Update. In this statement Lee Rowley, Minister of State for Housing (at the time) states:

“...the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale....”

Where policies which go beyond building regulations standards are proposed the WMS states that they should be justified through a robust viability assessment. Considering the information submitted in support for and the background documents to the CNHP it does not appear that this viability testing has been carried out.

Therefore it is considered that these policies do not meet the basic conditions required in that it doesn't align with government guidance.

The policies which relate to these matters should be removed from the plan and a reliance placed upon the Building Regulations standards or the proposals should be supported by robust viability evidence to demonstrate that these requirements would not have an adverse impact upon the viability of developments coming forward in Cirencester.

However, the WMS notes that where policies are justified they must be applied flexibly allowing for non-compliance where it is demonstrated that meeting the higher standards is not technically feasible. This is particularly the case in Cirencester which contains a large number of old, historic buildings that are unlikely to be able to be adapted to meet current standards without significant investment and loss of floor area. Therefore, should the CNHP proceed including these policies the policy should be amended to allow flexibility in the application of these standards.

Policy TMN 1 – 20 Minute Neighbourhoods

BE and BDL strongly support the concept of a 20 minute neighbourhood. This may impact on the uses within the Town Centre and a hub and spokes hierarchy to such should be taken. The Steadings has been designed to meet this criteria with schools, facilities and essential retail uses all within easy walking and cycling distances.

Whilst not fully completed at this stage The Steadings will be able to expand the area identified in the draft plan providing community facilities, education, retail, employment and green spaces complying with the principle of the 20 minute neighbourhood. It is suggested that the proposed facilities should be identified as having the potential to enhance the 20 minute neighbourhood principle in the Town.

Siddington School should also be factored into the 20 minute neighbourhood plans. Whilst outside of the plan area it is adjacent to it and offers education provision to children within Cirencester. In addition, Cirencester Park should also be identified for its recreational value in the open space plan.

In other regards, whilst the policies would meet the basic conditions it is not considered necessary for policies which will appear (or do appear) in the Local Plan to be replicated in the CNHP. This includes policies on Air Quality and Noise Pollution.

We trust that the above comments will be taken on board in a constructive manner in order to provide a neighbourhood plan that meets the requirements of the NPPF, including being flexible and deliverable. If you have any questions in relation to these representations please contact Dawn Brodie or Robert Linnell at the above address.

Yours faithfully

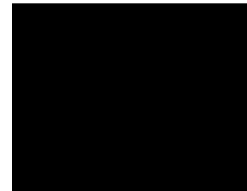


Savills

Our Ref: 105181-024

28 May 2026

Cotswold District Council
neighbourhood.planning@cotswold.gov.uk
via email only



Dear Sir /Madam,

Cirencester NDP Regulation 16 Consultation – 16 April to 29 May 2026 Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Early engagement with NESO is recommended in order to establish available supply capacity to any potential development sites and what, if any, reinforcement is required to ensure adequate continued supply. Please consult with NESO separately from NGET.

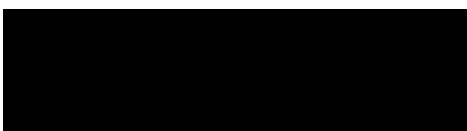
NGET assets within the Plan area

Following a review of the above Neighbourhood Development Plan Document, we have identified one or more NGET assets within the Plan area. Details of NGET assets are provided below.

Asset Description

Overhead Transmission Lines:

ZF ROUTE TWR (337A - 424B): 400kV Overhead Transmission Line route: COWLEY - MINETY - FECKENHAM - MINETY.



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A plan showing details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below.

<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>

NGET Electricity Network Infrastructure

The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable the existing and new electricity generation, storage, and interconnection infrastructure that the country needs to meet the rapid increase in electricity demand required to transition to net zero, while maintaining energy security.

In general, NGET does not own the land crossed by its overhead lines but has responsibility for maintaining the equipment and safe supply of electricity. The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET assets.

Despite this NGET is not a statutory consultee in the plan-making process but it is recommended that NGET are consulted at the earliest possible opportunity in order that advice and guidance can be taken into account on development near overhead lines, or wider policies that may affect the existing or future supply of electricity.

With the above context in mind, the Council should ensure that development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement or future network expansion. The Council should safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations and resist development or highway alterations that would prejudice, constrain or render impractical AIL access unless suitable mitigation or alternative agreed routes can be secured.

New Infrastructure

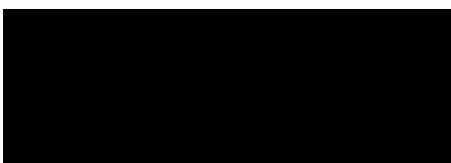
Demand for electricity is expected to rise significantly as the way we power homes, businesses and transport evolves. As the UK transitions towards net zero, fossil fuels will be replaced by increasing volumes of low-carbon electricity, including from offshore wind and other renewable sources.

The UK Government has committed to achieving net zero emissions by 2050, requiring a balanced approach to greenhouse gas emissions and removals. Decarbonising the energy system is central to meeting this national objective.

National Grid Electricity Transmission (NGET) is delivering a range of infrastructure projects across England and Wales to support this energy transition and ensure that the transmission network can accommodate the rapid growth in low-carbon generation.

The way NGET generates electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea. Taking this context into account, In planning for the area the Council should:

- **Safeguard all existing NGET transmission assets**, including overhead lines, underground cables and substations.



- **Support future reinforcement and expansion**, including works required for the Great Grid Upgrade and other strategic national infrastructure projects.
- **Ensure development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement, or future network expansion.**
- **Safeguard existing and potential access routes** required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations.
- **Resist development or highway alterations that would prejudice, constrain or render impracticable AIL access**, unless suitable mitigation or alternative agreed routes can be secured.
- **Encourage early engagement with NGET** to identify and resolve any potential impacts at the earliest possible stage of the planning process.

Protecting existing assets and enabling future network development will ensure that the Council contributes effectively to national decarbonisation targets while supporting local growth, resilience and energy security.

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.



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We would be grateful if you could add our details shown below to your consultation database, if not already included:

Angela Brooks MRTPI, Partner

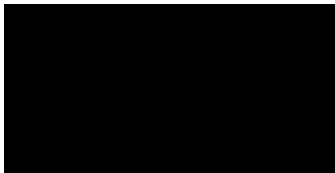


Tiffany Bates, Development Liaison Officer



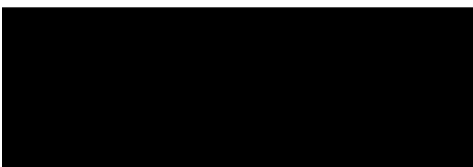
If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



**Angela Brooks MRTPI
Partner**

For and on behalf of Fisher German LLP



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Further Guidance

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Working Near NGET Assets

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's 'Design guidelines for development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgrid.com/document/345326/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their Technical Guidance Note 'Third-party guidance for working near National Grid Electricity Transmission equipment', which can be downloaded here: <https://www.nationalgrid.com/document/349291/download>

NGET have produced additional guidance for decision makers on operational noise emitted from existing and planned substation infrastructure. Detail is provided for environmental factors, established acceptable British standards and the 'Agent of Change' principle underpinned by the NPPF. More information can be accessed here: <https://www.nationalgrid.com/document/573711/download>

Further information on working near NGET assets can be found on the following webpage: <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/working-near-our-assets>

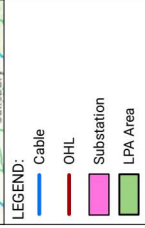
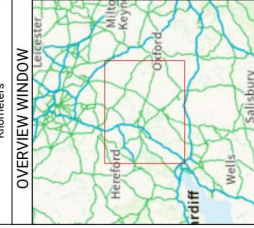
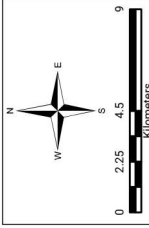
Assessing Electricity Network Infrastructure Applications

Regen, in partnership with the Department for Energy Security and Net Zero (DESNZ) have produced guidance for LPA's on assessing electricity network infrastructure applications. This is intended to be used as a practical tool for officers and details various legislative frameworks and infrastructure components that NGET engage with. More information can be accessed here: <https://3477141.fs1.hubspotusercontent-na1.net/hubfs/3477141/DESNZ%20planner%20guides/2026-03-31%20Assessing%20electricity%20network%20infrastructure%20applications%20-%20Regen.pdf>

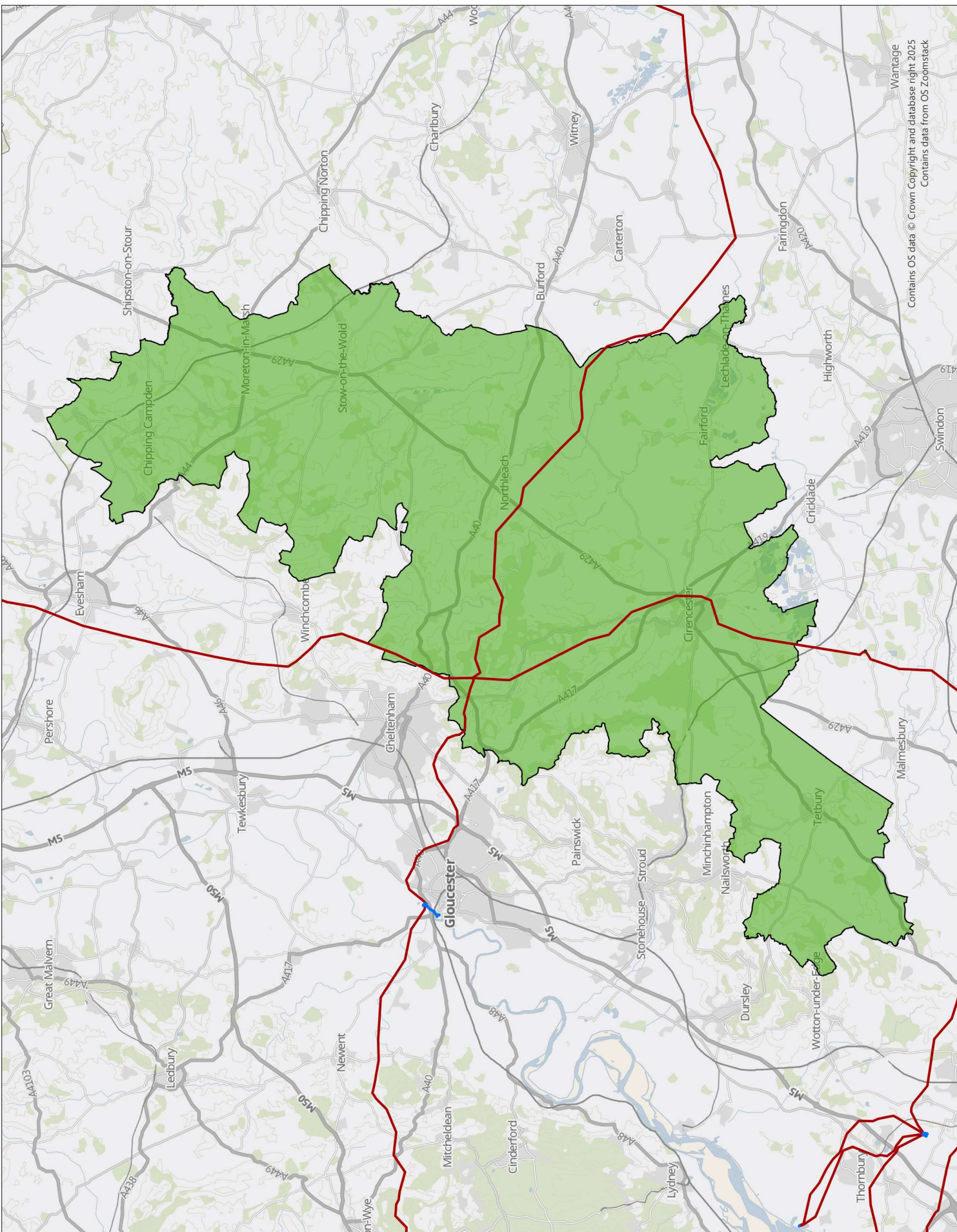
How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: ngplanning@fishergerman.co.uk



REVISION:	A
CLIENT:	nationalgrid
SCHEME:	PLANNING INTERACTION
TITLE:	LPA ASSET INTERACTION
FP:	105181-024
SCALE:	1:237,000 @ A3
DATE:	20/05/2025
<small>© Crown Copyright and Ordnance Survey 2025 Ordnance Survey License Number: A20200849937 Information produced by W4 and Registry. Crown copyright and database rights 2025.</small>	
DRAWING REF:	NG-2025-03-MT-OP-LPA-Cotswold



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Date: 29 May 2026
Our ref: 546567
Your ref: Cirencester Neighbourhood Plan

Rep #14: NATURAL ENGLAND

The logo for Natural England, featuring the words "NATURAL ENGLAND" in white capital letters on a green rectangular background. Below the green background is a solid black rectangular area.

NATURAL
ENGLAND

Mr Mark Harrison
Cotswold District Council

BY EMAIL ONLY

neighbourhood.planning@cotswold.gov.uk

Dear Mr Harrison

Cirencester Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above dated 16 April 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#) .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact:

Yours sincerely
Sally Wintle
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, [National Parks \(England\)](#), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#) .

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁴ website and also from the [LandIS website](http://www.landis.org.uk/)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

Rep #15: Resident & SG member

Mark Harrison

From: [REDACTED]
Sent: 29 May 2026 09:26
To: Neighbourhood Planning
Subject: Comments on Regulation 16 Cirencester Neighbourhood Plan

Dear Mark,

I have some comments on the Regulation 16 Cirencester Neighbourhood Plan dated 2026 ("Plan"). These comments relate only to changes made to the pre-submission consultation (Regulation 14) draft dated January 2024.

04 Aims and Objectives

At the end of each aim and objective text in the form "Policies X, Y, Z and Chapter A and B refer". I cannot find any explanation for this addition in the consultation statement. I assume this means that only those policies, text, and chapters referenced in square brackets are relevant to a particular aim and objective. Conversely, policies and text not referenced are not relevant. Is this your understanding also?

When the steering group started to prepare the regulation 14 draft there was much discussion about its structure, duplication across different chapters, grouping aims and objectives under a single heading, and so on. The steering group prepared for each chapter a table showing the aims and objectives to which each chapter and policy contributed. In the end the advice was not to use include these tables, remove duplication, and allow the plan to be interpreted as a whole. My concern is that introducing the form of words in square brackets into the Plan introduces a more restrictive interpretation of the Plan than intended by the steering group.

If this is the case then the square brackets and contents should be deleted. If the square brackets and contents are for guidance only and do not affect interpretation then this should be made clear.

06 Access and Movement

The diagram shown on pages 42 and 43 is an indicative diagram prepared for an early pre-regulation 14 consultation on the spoke and wheel concept. The intention of the steering group is that the routes supported by the Plan would, as a minimum, be the routes and priorities described in the current or future Cirencester Local Cycling and Walking Infrastructure Plan ("LCWIP") with additions specified in Chapter 06, together the spoke and wheel cycle and footpath network. The diagram on pages 42 and 43 should be clarified to say that it is indicative and does not show the entirety of the spoke and wheel cycle and footpath network.

Policy AM4 - Integrated Mobility Hub

The regulation 14, and earlier, consultation showed strong support to locate the mobility hub at the Old Station site and objection to other locations such as Waterloo and Forum. I believe this should be acknowledged in Chapter 06 of the Plan where the mobility hub is discussed so that it is not forgotten when the mobility hub location is considered.

The Old Station site satisfies the principles to determine the mobility hub location set out in the Plan.

07 Design and Built Environment

Policy DBE5 (a)

The amendment to DBE5(a) distorts the original purpose of the policy and means the policy cannot be satisfied. Therefore the policy is no longer effective and existing legislation would apply.

The purpose of DBE5 (a) in the Regulation 14 draft is to minimise energy consumption and therefore reduce greenhouse gas emissions and energy costs for users of the buildings. This policy was strongly supported with very few objections during the Regulation 14 consultation.

In the Plan the addition of the words “minimise embodied carbon” means the policy cannot be satisfied because it is not possible to minimise energy consumption and greenhouse gases, and, at the same time, minimise embodied carbon. Minimising one means the other is increased, not minimised. For example, minimising energy consumption requires materials used to be increased to provide among other things wall cavities, insulation, double glazing, heat recovery systems, which all increase embodied carbon.

If a policy cannot be satisfied developers need not comply with the policy. Instead developers would comply with current legislation. Paragraph 7.52 acknowledges the current legislation is not sufficient.

The amendment to add “minimise embodied carbon” is not suggested by any consultation response and it should be deleted so the policy works as intended.

The District Council in its Regulation 14 consultation response suggested the embodied carbon should be considered. If the council wishes to make a reference to reducing embodied carbon (which I and others would support) then it should do so while maintaining the original purpose of the policy.

Is it clear that the Construction Environmental Management Plan is to be provided at planning application and not at the start of construction?

Policy DBE5 (e)

This policy has been deleted in the Plan although no consultation response asked for it to be removed.

There is a consultation response (comment 25) which suggests the policy is clarified so that its purpose is clear. A better way to reflect the support this policy received and to respond to comment 25 is to reinstate DBE5 (e) to read “no carbon offsetting will be permitted as a way of meeting this policy”. This would allow carbon offsetting to mitigate for impact of construction traffic, for example.

Policy DBE4

The map on page 56 does not show all the non designated heritage assets or their correct location. The map on page 56 should be corrected, deleted, or the reference to the map in Policy DBE4 removed to avoid confusion between the map and Appendix 4. The latter was checked and corrected at the start of 2026.

Best



Rep #16: Resident & SG member

Mark Harrison

From: [REDACTED]
Sent: 29 May 2026 12:46
To: Neighbourhood Planning
Subject: Re: Comments on Regulation 16 Cirencester Neighbourhood Plan

[REDACTED]

Dear Mark,

I have discussed neighbourhood plans with lots of people in recent years and there are a couple of common concerns. The first is that made plans are routinely ignored (or seem to be ignored). The second is what's the point?

I wondered if it would be possible to include an obligation in the plan to prepare an annual report to counter these concerns. It would be good to demonstrate the value of a neighbourhood plan to the community.

I do appreciate it may be late in the day.

Best



Rep #17: GCC

To: Sent via e-mail.

Amartya Deb
Economy, Environment, and Infrastructure

Our Ref: 2026/04/CDC-CNPR16/AD

Your Ref:

Date: 29 May 2026

Dear Mark Harrison,

Cirencester Neighbourhood Plan (Regulation 16) Consultation

Thank you for consulting Gloucestershire County Council (GCC) on this matter.

GCC officers have reviewed the materials for Regulation 16 consultation of the draft Cirencester Neighbourhood Plan in Cotswold District. Officers are broadly supportive of many policies in the plan. Highlights of officer suggestions include:

- Reference to extreme heat and sustainable design of buildings
- Aiming for better air quality in line with EU and WHO standards
- Contributing to Net Zero through active travel, car clubs and public transport
- Opportunities in movement of goods and freight

GCC officers of transport planning would welcome further engagement and discussions on the policies AM1 and AM4 in the draft plan.

Officers also offer some suggestions where the navigation of the plan document (c. 140 pages) could be improved through better signposting.

Detailed officer-level comments are as below.

Yours sincerely,

Amartya Deb
Senior Planning Officer
Gloucestershire County Council

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DETAILED OFFICER COMMENTS

Archaeology

The aims and objectives, Policy TC1 and its underlying principles, and several other policies including, *inter alia*, DBE1, DBE2 and DBE4, will all serve to help protect the historic environment of Cirencester. Therefore, the plan is welcomed.

Climate Change & Air Quality

GCC officers welcome the robust climate policies detailed throughout the Regulation 16 draft of Cirencester Neighbourhood Plan. Officers find it encouraging to see some of the aspirations to go above and beyond national legislation.

02.The Cirencester of Tomorrow

On car use, it is detailed in **paragraph 2.9** that car dominance in Cirencester is high. Advocating for **electric vehicle (EV) car clubs** and/or developer contributions towards **on-demand bus services such as GCC's "Robin"** (where development is of sufficient scale to support this) will help meet travel demand, reducing reliance on private car ownership. As outlined in the draft neighbourhood plan, car dominance in Cirencester has brought with it negative consequences for health, safety, air quality and congestion.

Officers acknowledge car clubs and on-demand buses are outlined in **Policy AM4 – Integrated Mobility Hub**. Also, **paragraph 6.24.5** specifically mentions car clubs.

- [See also Transport Planning comments on Integrated Mobility Hubs.](#)

Policy AM6 – Sustainable & Active Travel

Policy AM6 on page 41 details a “**travel hierarchy**”, however the reader is not told where this is in the document – it is later found on page 48 under **paragraph 6.24** and is hard to identify. This also includes reference to an energy hierarchy on page 52, which is then later found under **paragraph 7.60** on page 61.

05. Cirencester Town Centre and Areas of Distinctive Character

GCC officers strongly support principles of “Green to the Core” and “Flexibility and Multi-Functionality” (as outlined in page 38).

- *Climate Resilient Design*

GCC officers note increased rainfall intensity with climate change is referenced (paragraph 10.49). In addition, officers would **encourage further reference to** climate resilient design, particularly **extreme heat**. The [Gloucestershire Climate Vulnerability Risk Assessment \(CVRA\)](#) has identified future increased frequency and intensity of heatwaves in the county. The elderly are particularly vulnerable to the impacts of extreme heat. Within the Cotswolds, the Office of National Statistics has identified the number of people aged 65 to 70 years, rose by 31% between 2011 and 2021. In Gloucestershire, the [number of people aged 65+](#) between 2018 and 2043 is projected to increase by 52.5%.

- *Wildfires*

The CVRA highlights a projected increase in the **incidence of wildfires** across Gloucestershire. As a recent instance, the assessment notes, how during August 2022, in Cherington (Cotswold District) a wildfire spread across 50 acres of farmland. Plan makers may wish to take appropriate measures in protecting buildings and natural areas that are exposed to such risks.

07. Design & Built Environment

As outlined in **paragraph 7.52** of the draft neighbourhood plan, the Future Homes Standard only mandates a 75-80% carbon reduction on existing emissions and not carbon neutral development. Given the climate emergency declarations made by Gloucestershire County Council, Cirencester Town Council and Cotswold District Council, GCC officers understand that achieving net zero development is critical to meeting targets. Therefore, GCC officers strongly support **paragraph 7.50** and find aspirations to achieve higher standards to meet net zero commitments particularly encouraging.

Policy DBE5 – Net Zero & Energy Efficiency Measures in the Design & Construction Process

Clarification on the scope of Construction Environmental Management Plans (CEMPs) may be needed. Typically, CEMPs are required for major developments

e.g. 10 or more dwellings, commercial development over 1,000m² or sites larger than one hectare. Usually, CEMPs will not include references to net zero design or construction, nor energy efficiency within them. They, however, will include construction site details, roles and responsibilities for the site, environmental controls for noise, dust, water, emissions etc., during construction, monitoring and reporting for construction, community engagement and construction regulatory compliance.

GCC officers strongly support the outlined details of Policy DBE5. Officers feel, the inclusion of green infrastructure here may be beneficial for air quality, biodiversity, and microclimate. For example, planting of deciduous vegetation can provide shading and cooling in summer and maximise solar gain in winter. Cheltenham Borough Council have produced a Net Zero and Planning Supplementary Planning Document which may be of use here.

On EV charging – EV charging infrastructure is encouraged (and ideally above the thresholds set by the Building Regulations Approved Document S).

GCC officers would welcome further emphasis that active travel should be prioritised over EVs. E.g., officers suggest the inclusion of cycle storage with new residential development, and the inclusion of showers, lockers dry/changing rooms with business development where active travel is a viable transport option.

Whilst officers appreciate comments regarding unfavourable cycling conditions in Cirencester on **page 20** of the draft neighbourhood plan, Gloucestershire County Council is implementing a phased, four-year rollout of 20mph speed limits in residential areas, town centres, and village hubs, starting in 2026/27 which will help bring safer roads for active travel. Additionally, we should also be mindful of growing e-bike and e-scooter use which allows people to travel greater distances compared to conventional cycling.

DBE6 – Energy Use in New Buildings

Section (a) of DBE6, states *“new residential developments should not use fossil fuels on-site for space heating or hot water provision”*. GCC officers strongly support this policy particularly on grounds for air quality, environmental and health concerns.

The Future Homes Standard continues to permit use of wood-burning stoves as a secondary heat source. GCC officers of air quality do not encourage this due to associated health and environmental impacts. Local authorities across Gloucestershire are actively pursuing both behavioural change initiatives and policy interventions to discourage the use of wood burning.

7.51 – all domestic private rented homes [will need to be](#) at least EPC C by 2030.

7.66 – On climate change, HMOs can be vulnerable to removal of vegetation, and replacement with hardstanding/artificial grass to mitigate landlord/tenant garden maintenance needs. Reference to the importance of vegetation, particularly for biodiversity, but also heat resilience (again in light of our CVRA identifying increased

extreme heat in Gloucestershire) may be prudent. **Section c) of policy NE3** of the draft plan is appreciated in this regard.

6.19.5 – GCC officers would encourage consideration towards secure cycle parking here, alongside toilet, changing room and locker facilities to support multi-modal transport options.

Policy WBC1 – Air Quality

Policy WBC1 and page 99 on air quality are strongly supported. We particularly welcome reference to health concerns and particulates, notably how wood burning contributes significantly to particulate matter levels, alongside vehicles (including electric vehicles). Looking at the 2021 census data, of all the district, city and borough councils within Gloucestershire, the Cotswolds had the second highest reported levels of wood burners as their only heating source. Despite a lack of particulate matter emissions data in the county, due to a multitude of associated adverse health impacts, more action is needed to ensure we are protective of existing, and future occupier health.

Officers support the reference to an “**Air Quality Neutral Standard**”. Please note, Gloucestershire County Council has been advocating for adoption of EU air quality targets (i.e., annual average nitrogen dioxide is not to exceed 20µg/m³) which is more stringent than current UK air quality targets (i.e., not to exceed 40µg/m³).

Other local authorities have begun adopting EU targets to ensure they continue to be protective of local population health. In Gloucestershire, this includes Cheltenham Borough Council and Gloucester City Council.

The World Health Organisation (WHO) has an even more stringent target (i.e., not to exceed 10µg/m³).

In Cotswold District, 25% of monitoring sites in 2025 exceeded EU levels. When considering the WHO levels, this was 81%. More specifically for Cirencester, a list of monitoring sites with EU and WHO exceedances is as below:

Monitoring Sites exceeding EU levels for nitrogen dioxide:

- Abbey Way Junction

Monitoring Sites exceeding WHO levels for nitrogen dioxide:

- London Road
- Lewis Lane
- Stroud Road
- Bartonbury Lodge, Stroud Road
- Tetbury Road (O/S Steading Cottages)

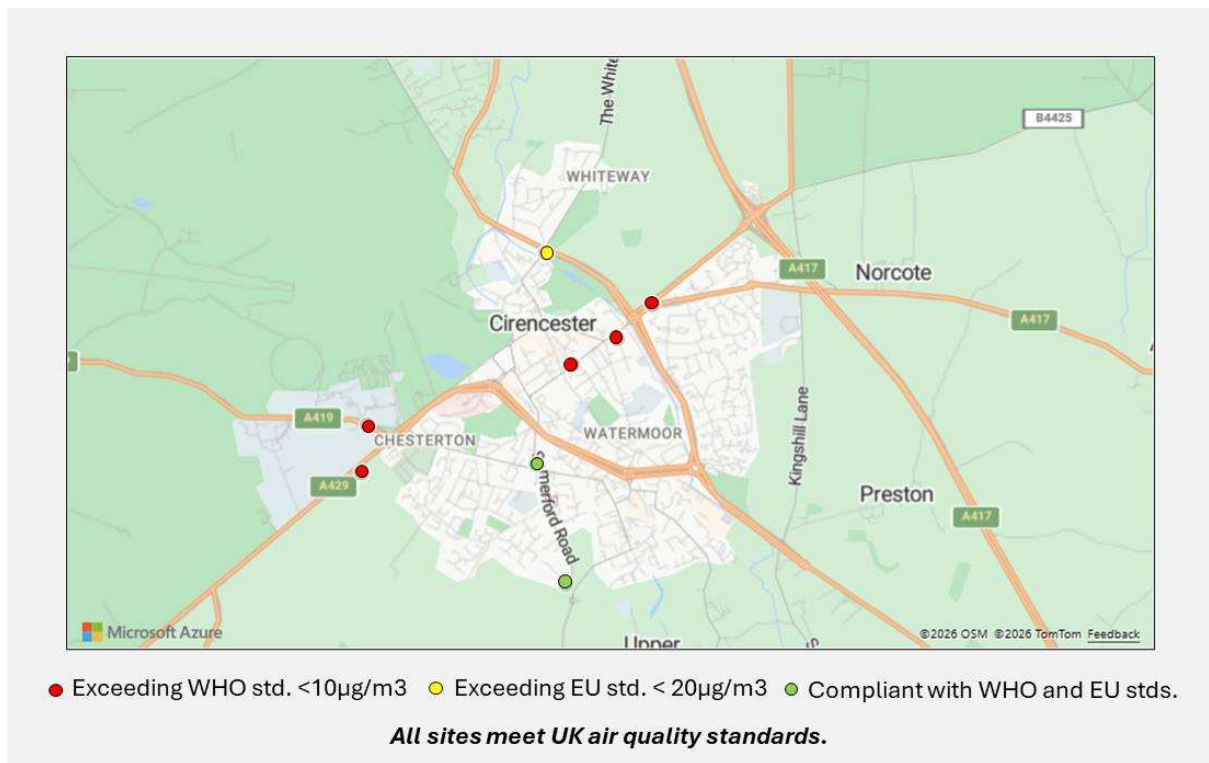


Fig. 1. WHO and EU exceedances in Cirencester. Source: GCC officers based on [Air quality monitoring dashboard | Inform Gloucestershire](#). Please note, data is based on an annual average and for nitrogen dioxide only.

Ecology

10. The Natural Environment

GCC officers welcome the comprehensive and well thought through chapter 10 on the Natural Environment. We have the following observations to make.

In February 2026, GCC adopted the Gloucestershire Local Nature Recovery Strategy (LNRS). More information on the LNRS can be found here: [Gloucestershire Local Nature Recovery Strategy | Gloucestershire County Council](#)

Furthermore, in March 2026, Sections 98 and 99 of the Levelling-up and Regeneration Act (LURA) 2023 came into force. This now means that there are additional legal compliance requirements for neighbourhood plans.

Section 98 of the LURA states the following:

(b) take account of any local nature recovery strategy, under section 104 of the Environment Act 2021, that relates to all or part of the plan area, including in particular —

(i) the areas identified in the strategy as areas which —

*(A) are, or could become, of particular importance for biodiversity, or
(B) are areas where the recovery or enhancement of biodiversity could
make a particular contribution to other environmental benefits,*

*(ii) the priorities set out in the strategy for recovering or enhancing biodiversity,
and*

*(iii) the proposals set out in the strategy as to potential measures relating to those
priorities.*

The most current PPG Paragraph: 046 Reference ID: 8-046-20250219 Revision date: 19 02 2025 provides further detail on to “have regard” to Local Nature Recovery Strategies in plan making, which could help support your decisions on how to ‘take account’ of the LNRS until further updates are confirmed by the new NPPF and PPG (possibly this summer).

GCC officers recommend that plan makers review the natural environment chapter in light of these recent changes and use the [Gloucestershire LNRS](#) as evidence base.

GCC officers inform that there are going to be significant changes Biodiversity Net Gain delivery coming soon meaning that it will only be applicable to larger development sites and NSIPs. There are several references to “deliver biodiversity net gain” through the document such as Principle 20. Plan makers may wish to review if statements such as this are relevant within the BNG planning context.

Libraries

GCC officers have no further comments to make.

Minerals and Waste Planning

GCC officers have no further comments to make.

Public Health and Communities

GCC officers have no further comments to make.

Transport Planning

06. Access & Movement

GCC officers welcome the welcome the focus with the draft Cirencester Neighbourhood Plan to create a convenient, robust, and flexible network of streets and spaces that promote all modes of active travel leading to **reduced reliance on private vehicles**.

GCC officers are **supportive of the need for enhanced public transport, increasing safe pedestrian and cycle access** generating more opportunities for permeability to existing and new development, avoiding connections which are

historically hindered by highway barriers and gaps in walking and cycling routes, recognised in draft Cirencester Neighbourhood Plan policies.

- *Public transport & active travel*

In respect to transport and the movement of people, the Regulation 16 draft of Cirencester Neighbourhood Plan recognises the challenges of poor public transport provision and over-reliance on cars for transport and the impacts to road safety, **congestion at peak hours** (A417 and A429) and **major events creating noise and air pollution** and the “ring road effect” limiting permeability to walk, wheel and cycle due to limited accessible suitable crossing points.

The draft neighbourhood plan supports other transport options alongside car use and to promote active travel, specifically the Local Cycling and Walking Infrastructure Plan (LCWIP) for Cirencester. The draft plan highlights the need for safe cycling routes from the town into the countryside, specifically the strategically important route to Kemble Station, and the limited safe routes to the west and south (the Cotswold Lakes) for commuting, connecting schools and residential areas, cycling and walking long-distance routes.

The draft plan provides a positive framework, and it is great to see the LCWIP referenced and supported. This **could be strengthened further** by safeguarding future strategic walking and cycling links – particularly connections to Kemble, the town centre, education and employment. Development proposals should demonstrate how they integrate with and extend the wider network, not operate in isolation.

Policy AM1 – The Cirencester Spoke & Wheel Cycle and footpath Network
Policy AM4 – Integrated Mobility Hub

Whilst offering broad support in principle, GCC officers are **unable to comment in detail** on proposals for **integrated mobility hub and a ‘20-minute neighbourhood’ model** approach and the ‘Cirencester spoke & wheel cycle and footpath network’ model approach across the whole of Cirencester in the draft neighbourhood plan policies. **GCC officers would welcome detailed engagement and agreement on these model approaches.**

- *Carbon emissions*

GCC officers are **supportive of facilitating a reduction in carbon emissions** and contributing to achieving the national goal of net zero.

We see the draft neighbourhood plan policy for the protection of existing, and delivery of new easily safe accessible community infrastructure, which include services, to support the future sustainable growth of Cirencester that enhances the natural environment and protects green and blue spaces to be in line with the draft neighbourhood plan’s transport policy.

GCC officers support the **rebalancing of travel** within the plan area and connecting schools and residential areas to the centre and to each other and the creation of new walking and cycling links, bus stop and Real-time passenger Information (RTPI) infrastructure and Kemble Railway Station enhancements supported by new development and other funding opportunities.

The draft neighbourhood plan identifies the need for well managed sustainable tourism as there is no allocated coach facilities in Cirencester for which GCC officers offer support in principle.

- *Goods and freight*

The **draft neighbourhood plan has not identified** the movement of goods, freight and logistics in terms of existing movement, alternative fuels for freight (including coaches) future growth and carbon management and tourism related peaks in demand. There may be opportunities for parcel delivery lockers at interchange hubs for example.